

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

**RE: PETITION OF BAY STATE GAS COMPANY
FOR APPROVAL OF REVISED TARIFFS**

DTE 05-27

FIRST SET OF INFORMATION REQUESTS OF LOCAL 273

UWUA 1-1

Please provide the information requested below at least on an annual basis and, if compiled or accessible for shorter periods of time, (e.g., quarterly), for such shorter period of time, for the period September 1, 1997 to the most recent date available in 2005.

(a) Please provide the total staffing level for Bay State, including full-time, part-time, temporary and permanent employees, whether considered union payroll, management, or non-union/non-management, but excluding outside contractors and any allocations of the time expended by employees who work for NiSource affiliates (e.g., any NiSource Corporate Service Company or the like).

(b) Please provide the same information requested in (a) but separated into all sub-categories the company's records reflect, such as union v. management, union v. non-union, division (Brockton./Springfield/Lawrence), or function (e.g., call center, telephone response, "physical" workers, billing, etc.). Please provide a separate count of employees at the Westborough headquarters for the periods requested. To the extent any adjustments have been made in the categories that will be provided in response, please provide a verbal description of any such changes to how employees are categorized for purposes of employee head counts.

(c) To the extent not already provided in response to this request, please separately list the staffing levels at the Springfield call center.

(d) During this period, has Bay State handled customer calls at any location other than Springfield? If yes, name the location(s) and provide the staffing levels for this location(s) as well.

UWUA 1-2

For the period September 1, 1997 to date, please provide any and all reports, studies, internal memoranda or e-mails regarding any of the following topics:

(a) increasing or reducing the staffing level among Bay State employees as a whole, or at any particular location (e.g., at the Westborough headquarters or within the Brockton, Springfield or

Lawrence divisions), or by function (telephone call center, management/accounting/legal, “physical” workers, etc.).

(b) outsourcing of any jobs performed by Bay State employees to outside vendors or any entities, including to other NiSource affiliates or subsidiaries.

(c) the company’s internal discussions and analysis of or response to the actions of the New Hampshire Public Utilities Commission in terms of establishing service quality standards and the resulting fines that the company paid in NHPUC DG 01-182 or any related docket. Please include in this response any and all written and electronic communications regarding any increases (or decreases) in the Springfield call center staffing levels on or after January 1, 2003.

(d) To the extent not already provided in response to this question, please describe the role that Steve Bryant may have played in any changes to the staffing level at the Springfield call center since January 1, 2001. Also describe the roles of other managers, supervisors, or executives. Include all internal communications between Mr. Bryant and any other Bay State or NiSource officer, employee or executive.

UWUA 1-3

Please explain all of the discrepancies between staffing levels as reported by the company in DTE 05-12 and DTE 04-12. (For example, in DTE 05-12, Bay State reported the following FTEs by year: 815 (1998); 782 (1999); 735 (2000), 671 (2001), 532 (2002), and 504 (2003), whereas it reported the following FTEs in DTE 04-12: 950 (1998), 911 (1999), 853 (2000), 781 (2001), 622 (2002), and 592 (2003). To the extent that the discrepancies are due to recategorizing whether employees are full-time versus part-time, or considered on Bay State’s payroll versus the payroll of a another NiSource company, or for any other reason, please provide an explanation.

UWUA 1-4

(a) Please list the names and job titles of those individuals who would have been involved in any decisions to increase or decrease staffing levels among any category of Bay State employees for the period September 1, 1997 to date. To the extent that different supervisors, managers or executives would have been involved in connection with decisions to change staffing levels depending on the job category affected, please denote their respective roles by job category. (E.g., “For job changes at the call center, supervisors A & B would have made recommendations, and managers and executives C, D & E would have reviewed and signed off on those recommendations.”)

(b) To the extent not provided in response to UWUA 1-2 above, please provide a copy of all written reports, economic analyses, recommendations and internal communications regarding the changes in staffing levels described in (a).

UWUA 1-5

Please provide copies of all documents, communications, press releases and other written materials that Bay State or NiSource have provided to investors, investor analysts, board members or the press regarding changes in staffing levels since September 1, 1998 and the present date.

UWUA 1-6

For the period starting with Bay State's merger with NiSource and up to the present date, and regarding functions or services previously provided by employees on Bay State's own payroll that are now provided by employees on the payroll of some other NiSource company, please:

(a) specify the job titles and job functions that were previously provided by Bay State but that are now provided by some other NiSource company, including the numbers of FTEs at Bay State that were performing these functions, and the last date on which Bay State employees performed these functions, and

(b) the job titles and job functions of the employees now performing those functions, including the name of the NiSource company employing such persons and the dates they began performing these functions for Bay State.

Please include both union and management job titles and functions in your answer.

UWUA 1-7

(a) Please provide an organizational chart that includes all of Bay State's employees, and all such changes to that organizational chart, for the period September 1, 1997 to date. If there are different organizational charts for different purposes, such as organizational charts for the three geographic divisions in Massachusetts and separate charts for "physical" versus office/clerical workers regardless of region, please provide all such charts.

(b) Please provide a current organizational chart that shows all NiSource operating companies, affiliates, and subsidiaries.

UWUA 1-8

Please provide a copy of all written documents or electronic communications sent by the Maine PUC to Bay State, Northern Utilities or NiSource, or sent by any of those companies to the Maine PUC in connection with the management audit of Northern Utilities in ME PUC 2002-140 (May 16, 2002). Include a copy of the final audit or report issued in that matter.

UWUA 1-9

Please explain how incoming calls are queued at the Springfield call center that handles calls for

Bay State and Northern Utilities, including any flow charts or diagrams that explain how calls are directed to emergency handling, direct response by a live customer service rep, directed to interactive voice response, etc. Include in the answer whether incoming calls from Northern versus Bay State customers are segregated in any way, either in terms of which customer service reps handle the calls or which calls are given priority.

To the extent that the protocols governing the processing or handling of calls have changed since January 1, 2002, please explain all such changes.

UWUA 1-10

(a) Please explain how calls are counted for purposes of reporting the telephone response statistics, if the caller reaches a busy signal and then hangs up. Is this call not counted at all in the totals; counted as a call not answered within 20 (or 30) seconds; or counted in some other manner?

(b) Please explain how calls are counted for purposes of reporting the telephone response statistics, if the caller reaches interactive voice response and then hangs up before speaking to a live customer service rep. Is this call not counted at all in the totals; counted as a call not answered within 20 (or 30) seconds; or counted as a call answered in 20 (or 30) seconds?

(c) To the extent that the rules or protocols governing how these calls would be counted have changed since January 1, 2002, please explain all such changes.

(d) For the period January 1, 2000 to present, please provide a schedule showing the (1) busy signal rate, (2) call abandonment rate (separated by emergency or gas leak calls and all others), (3) average time to answer, and (4) percent calls answered within 20 seconds and 30 seconds, for each quarter.

UWUA 1-11

(a) For the period January 1, 1998, please provide a copy of any all formal citations, fines, or letters from any local, state or federal authority, agency or regulator regarding any safety violation, infraction or incident involving Bay State. Specifically include any such materials regarding the gas explosion in Attleboro in 1998 and any materials regarding Dig Save violations on the company's system.

(b) Please list all law suits, claims or demands made by any person or entity claiming injury or damage in connection with Attleboro Gas explosion.

(c) Please list any and all amounts paid (or agreements to make payments in the future) by Bay State, any affiliated company, or any of the company's insurers, to any person or entity claiming injury in connection with the Attleboro Gas explosion.

UWUA 1-12

Please provide a copy of all service quality reports filed with the Department by Bay State in connection with DTE 99-84 and subsequent service quality dockets.

UWUA 1-13

(a) Please provide a schedule tabulating Bay State's operations and maintenance expenditures from January 1, 1998 to present. Separate out, if available, the O & M expenditures for service lines versus main repairs. To the extent any portion of these expenses are based on billings or allocations from Bay State or NiSource affiliates, please identify those amounts and explain the basis for making any such allocations.

(b) Please provide a schedule tabulating Bay State's capital expenditures from January 1, 1998 to present. Separate out the capital expenditures for service line replacements or extensions and main replacements or extensions. To the extent any portion of these expenses are based on billings or allocations from Bay State or NiSource affiliates, please identify those amounts and explain the basis for making any such allocations.

(c) Please provide a general description of how Bay State decides to classify expenditures as O & M versus capital expenditures.

UWUA 1-14

For the period January 1, 1998 to present, please provide a description, with a list of locations, of the types of buildings, offices, etc. where Bay State customers can pay their bills in person, including (i) company-owned or company-rented facilities; (ii) pay stations (e.g., convenience stores that accept customer payments under arrangement with Bay State); and (iii) any other type of location. To the extent these locations have changed over this period, please list all such changes, including both the opening or closing of any location.

UWUA 1-15

Please provide all documents relating to any changes in the company's policy regarding whether its collectors are allowed or required to accept payments from customers at (or just prior to) the time of termination. Include both a copy of the written policies regarding the relevant collection practice or policies, and the dates during which they were in effect.

UWUA 1-16

For the period January 1, 1998 to present, please list the location of each operations and maintenance facility that the company maintains (or maintained) in Massachusetts, including the number of employees (FTEs) at each such location and the functions they perform. To the extent the locations or staffing levels at any location have changed, please list all such changes. Also include a general description of the types of materials and supplies routinely stored and available

on site at these maintenance facilities.

UWUA 1-17

(a) Please name and summarize the various types of reports, studies or analyses the company uses to develop its capital expenditure plans.

(b) Please provide a copy of each such capital expenditure report, study, analysis or plan for the period January 1, 1998 to present.

UWUA 1-18

(a) For the period since the announcement of Bay State's merger with NiSource, please provide any and all documents, memos or e-mails from NiSource to Bay State providing guidance, advice, instructions or directions regarding the hiring of staff, staffing levels, or rates of compensation.

(b) For the period since the announcement of Bay State's merger with NiSource, please provide any and all documents, memos or e-mails from NiSource to Bay State providing guidance, advice, instructions or directions regarding the level of expenditures on O & M and capital expenditures, or the need to effect economies in these expenditures, or requests to control these expenditures.

UWUA 1-19

(a) For each division (Brockton, Springfield, Lawrence) and for the period January 1, 1998 to present, please list the number of supervisors, by year, at each location in connection with the physical work of inspecting, repairing or replacing lines and mains (and related tasks).

(b) Please list the names of the Bay State or NiSource employees, officers, etc. who were involved in any decisions to change the staffing level of these supervisors, and the respective role each such person played in making those decisions.

(c) Please include all internal written or electronic communications regarding changing the number of supervisors.

(d) For this period January 1, 1998 to present, please provide a copy of the written job description for supervisors of this type of lines and main repair/replacement function.

UWUA 1-20

(a) Are there Bay State employees whose task, in whole or in part, is to supervise control of corrosion on the company's lines and mains? If yes, please provide a written copy of the job description.

(b) For each year 1998 to present, please list the staffing level for the corrosion supervision function. To the extent the level has changed, please provide all internal written communications regarding any decision to increase or decrease the number of people performing this function.

UWUA 1-21

(a) Please provide a general description of how Bay State handles requests for new or expanded service, and, to the extent this varies depending on whether the prospective new customer is residential or commercial, please provide separate descriptions of how these requests are handled.

(b) Please list all locations at which requests for new or expanded service from existing or prospective customers have been handled since January 1, 1998. To the extent those locations have changed, please list all such changes.

(c) Please list the staffing level for the sales function (salespeople and any others) since January 1, 1998 including the dates of all changes to those staffing levels.

UWUA 1-22

Please provide a copy of any written complaints and a log of any verbal complaints made by any homeowner, contractor, developer, or existing or potential customer to the company, regarding requests for new or expanded service, for the period January 1, 1998 to present. Please include any complaints regarding actual or anticipated delays in obtaining the new or expanded service; complaints about any fees or charges proposed or actually imposed to obtain the new or expanded service; or complaints about any difficulty in communicating with the company's sales employees.

UWUA 1-23

(a) Please provide any and all plans, studies or reports the company has produced or obtained since January 1, 1998 regarding expanding the number of customers on its system, through advertising, promotions, or any other means.

(b) Please provide any estimates the company has made since January 1, 1998 about the number of gas customers who could be added to the system due to their proximity to existing lines.

(c) Please provide any goals or targets the company has set since January 1, 1998 to add new customers or have existing customers expand their service, and any tabulation of how successful the company was in reaching these targets or goals.

(d) Please provide a quarterly tabulation of the number of requests for new service, and, separately, for expanded service, for the period January 1, 1998 to present. If possible, separate out the requests for residential and commercial service.

UWUA 1-24

- (a) Does the company keep track of the amount of time between receipt of a request for expanded service and the actual installation of that service?
- (b) If “yes,” please provide a tabulation of the lag between request and installation of service, for each year 1998 to 2004.

UWUA 1-25

Please provide a copy of any credit ratings by Moody’s, Standard and Poor’s and Fitch, for Bay State, NiSource, NIPSCO and Northern Utilities for the period January 1, 2000 to present.

UWUA 1-26

- (a) Please provide a copy of the petition to the Indiana Utility Regulatory Commission for approval of the merger of Columbia Energy Group and NiSource.
- (b) Please provide a copy of the orders of the Kentucky, Ohio, Indiana and Pennsylvania utility regulatory commissions approving the merger of Columbia Energy Group and NiSource.
- (c) Please provide a copy of any and all reports made by NiSource to any utility regulatory commission concerning compliance by NiSource with any conditions of the merger of Columbia Energy Group and NiSource.

UWUA 1-27

- (a) Please provide a graph showing the linear feet of mains installed each year 1998 to 2004.
- (b) Please provide a graph showing the number of service lines installed 1998 to present.

UWUA 1-28

Please provide a table listing the company’s return on common equity for each year 1998 to present. Include an explanation and/or formula for how the company calculates return on common equity, including the treatment of any acquisition premium or other payments in connection with the merger with NiSource.

UWUA 1-29

Please provide a table showing the dollar amount of all dividends (quarterly, or by other payment period) paid by Bay State to NiSource from the date of the merger to the present. If Bay State makes other payments to NiSource, please list the amount and dates of such payments.

UWUA 1-30

(a) Please provide a table listing the number of (i) consumer complaints lodged against the company at the Consumer Division of the Department and (ii) the number of complaints made directly to the company, for the years 1998 to 2004. If the company maintains this complaint data on a more frequent periodic basis (monthly or quarterly), please provide the more detailed periodic data.

(b) Please describe the company's procedures for logging or classifying a communication from a customer as a "complaint." For example, must the customer make the complaint in writing, or say in a telephone call words like "I wish to lodge a complaint," for the company to log the communication or interaction as a complaint?

UWUA 1-31

Please provide separate customer counts for (i) residential and (ii) non-residential customers, for each year 1998 to present.

UWUA 1-32

For the period January 1, 1998 to present, please provide a copy of any and all communications between or among the Department, the company, and any customers (or advocates or representatives of customers) concerning Bay State's policies and practices for handling assertions of serious illness protections by customers. Please make sure to include all correspondence to or from Steve Bryant, and any communications to or from Michelle Lerner, Esq., a legal services attorney.

UWUA 1-33

(a) Please provide any and all surveys, ratings or benchmarking studies performed or provided by J. D. Powers or any other firm or entity regarding customer satisfaction, service quality or similar parameters, and involving Bay State, NiSource, or Northern Utilities, for the period since Bay State merged with NiSource.

(b) Please provide any studies, ratings, analyses or documents prepared by the American Gas Association or any other trade association, or by outside party, that compare or evaluate the following parameters for NiSource or Bay State: (i) level or adequacy of capital expenditures, or changes in the trends of such expenditures; (ii) level or adequacy of O & M expenditures, or changes in the trend of such expenditures; (iii) staffing levels; (iv) relative or absolute level of indebtedness; (v) relative or absolute growth in numbers of customers and/or volume of gas sold; (vi) profitability; (vii) any other financial or operational characteristics.

UWUA 1-34

Please state the names and titles of all employees, officers, or executives of any NiSource company and all outside consultants involved in the decision to move forward with the outsourcing process leading up to the recent choice of IBM as the outsourcing vendor. Describe

the respective roles of each person named in this response. To the extent not already provided in response to UWUA 1-2, please provide all written and electronic documents (including e-mails to or from Steve Bryant, Robert Skaggs or Gary Neale) that were part of the discussions or process of deciding to move ahead with the current round of outsourcing.

UWUA 1-35

For each major job category of current Bay State employees (e.g., billing, call center/customer service, maintenance and repairs, etc.), please provide the average years of experience as a Bay State employee for all employees in that job category.

Respectfully Submitted,

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